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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

E. JEAN CARROLL,

Plaintiff,

v.

DONALD J. TRUMP, in his personal capacity,

Defendant.

Civil Action No.: 1:20-cv-7311-LAK-JLC

**DECLARATION OF ALINA HABBA,
ESQ. IN SUPPORT OF DEFENDANT'S
OPPOSITION TO PLAINTIFF'S
MOTION TO AMEND**

I, Alina Habba, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am managing partner of the firm of Habba Madaio & Associates LLP, counsel for Donald J. Trump (the "Defendant") in the above-captioned matter (the "Action").

2. I submit this declaration in support of Defendant's Memorandum of Law in Opposition to Plaintiff's Motion to Amend. The facts herein are true and correct and, unless otherwise stated, are within my personal knowledge.

3. As counsel for Defendant, I have reviewed pleadings and other documents related to the Action, and I am familiar with the facts and circumstances of this case.

4. Attached hereto as **Exhibit A** is a true and accurate copy of the *New York Magazine* article dated June 21, 2019 and entitled “Trump assaulted me in a Bergdorf Goodman dressing room 23 years ago. But he’s not alone on the list of awful men in my life.”

5. Attached hereto as **Exhibit B** is a true and accurate copy of the original Complaint filed in this matter by Plaintiff on November 4, 2019.

6. Attached hereto as **Exhibit C** is a true and accurate copy of the Complaint filed in the matter of E. Jean Carroll v. Donald J. Trump, Case No. 1:22-cv-1001 (S.D.N.Y 2022) (“*Carroll II*”) on November 24, 2022.

7. Attached hereto as **Exhibit D** is a true and accurate copy of the relevant portions of Plaintiff’s trial testimony in *Carroll II*.

8. Attached hereto as **Exhibit E** is a true and accurate copy of the jury verdict issued in *Carroll II*.

9. Attached hereto as **Exhibit F** is a true and accurate copy of the Notice of Appeal filed in *Carroll II*.

10. Attached hereto as **Exhibit G** is a true and accurate copy of the transcript of Defendant’s CNN Town Hall appearance on May 10, 2023.

11. Attached hereto as **Exhibit H** is a true and accurate copy of the relevant portions of the deposition transcript of Plaintiff dated October 14, 2022.

Dated: June 5, 2023

Respectfully submitted,


Alina Habba, Esq.
Habba Madaio & Associates LLP